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Pesticide Disposal in Massachusetts Agriculture

Executive Office of Environmental Affairs
James S. Hoyte, Secretary
Massachusetts Department of Food and Agriculture
August Schumacher, Jr., Commissioner

November 2, 1987

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PESTICIDE DISPOSAL IN MASSACHUSETTS AGRICULTURE

Executive Office of Environmental Affairs
Department of Food and Agriculture
Division of Regulatory Services
Pesticide Bureau
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November 2, 1987

Special thanks to Paul Gosselin, Gail Kaprielian and Leonard Wallace for compiling and writing this report

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The Commonwealth of Massachusetts

Department of Food and Agriculture

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Executive Summary

The careful disposal of uneeded pesticides is a crucial environmental imperative. Few workable solutions to this problem have been developed and implemented, leaving regulators, pest control operators and the farming community unable to adequately address this important matter.

In an effort to more clearly understand current disposal practices and determine approximately the amount of pesticide waste requiring disposal in the Commonwealth, the Department of Food and Agriculture this year conducted survey of Massachusetts farmers. The attached report, "Pesticide Disposal in Massachusetts Agriculture," describes the results of that survey and offers conclusions and recommendations regarding pesticide waste disposal problems.

Based on the survey and other indications, we have concluded that current pesticide disposal practices are inadequate and that steps need to be taken to dispose properly of the substantial amount of pesticide waste which we know exists in Massachusetts. The situation in which we find ourselves stems from a number of circumstances. Overlapping and conflicting statutory requirements, the high costs of disposal, the shortage of licensed disposal facilities and the lack of clear guidelines for farmers and pest control operators about pesticide waste disposal all contribute to the problem.

To deal with this matter, the Department of Food and Agriculture proposes a two-step program which would first eliminate existing stockpiles of pesticide waste and then prevent their accumulation in the future.

1. A Program to Remove Existing Pesticide Waste

- The Commonwealth would contract a licensed hazardous waste hauler to identify and remove existing pesticide wastes from Massachusetts farms;
- The Commonwealth would subsidize half of the cost of disposal with farmers paying the other half of the cost of disposal;
- Legislation would have to be enacted to allow the Department to raise the pesticide product registration fee and create a dedicated account to fund this program.

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2. A Program to Prevent Future Accumulation of Pesticide Waste

- Increase education and training of pesticide applicators in methods of handling pesticides so that we can minimize the accumulation of pesticide waste;
- Careful evaluation of registration decisions;
- Further consideration of on-site treatment options, and;
- The possibility of promulgating new regulations for the handling of pesticide waste, rinsate and containers.

If you would like more information on the initiatives outlined in this report, please do not hesitate to contact us.

Sincerely,

August Schumacher, Jr.
Commissioner

INTRODUCTION

Over the past century, great advances have been made in agriculture. Today, farmers produce enough food to feed eighty people compared to a farmer eighty years ago who could only produce enough food to feed seven people. Cultivation practices, mechanization, improved varieties and cultivars, agricultural science and agrichemicals have played a significant role in increasing yields and productivity. The use of agricultural chemicals has been an important factor in agricultural success over the past thirty years. Their use has made a significant contribution to the production of food and fiber and to the overall quality of life.

Some of these same chemicals, either deteriorated from age, cancelled by state or federal authorities or otherwise unwanted, have remained in barns and storage sheds across the Commonwealth. These present an environmental risk.

As pesticide products age, the likelihood of containers leaking or bags ripping increases, representing a risk of groundwater contamination and/or incidental exposure to the pesticide. In the event of a fire, many old barns and storage sheds are a source of highly toxic fumes created during extreme heat and/or a source of pesticide run-off due to heavy water use.

The problems associated with long term storage of pesticide waste is compounded by the lack of clear guidelines and information available to farmers, overlapping and conflicting statutory requirements, the lack of in-state facilities for

disposal and the extreme costs for hiring a licensed hazardous waste hauler. These problems also impact the handling of empty containers and rinsates produced from washing equipment and triple rinsing containers.

This proposal represents a commitment by the Department of Food and Agriculture to define the magnitude and extent of the problems associated with pesticide storage and disposal as a first step in developing a workable solution.

STATUTORY REQUIREMENTS

There are two applicable federal statutes that apply to the handling, transportation and disposal of pesticide wastes. Both of the federal statutes are implemented by the appropriate state agencies.

Pesticides are primarily regulated through the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) as amended and the Massachusetts Pesticide Control Act. The Department of Food and Agriculture is the administrative agency which regulates the use of pesticides under these statutes at the state level.

It is a violation of both FIFRA and the Massachusetts Pesticide Control Act to use a pesticide in a manner inconsistent with its labeling instructions covering use. The definition of 'use' includes application, storage, transportation and disposal activities.

In order to be legally used, pesticides must be registered with the Environmenal Protection Agency (EPA) and the Department of Food and Agriculture through the Pesticide Board Subcommittee. When a pesticide product has its registration revoked by either the EPA or the Massachusetts Pesticide Board Subcommittee, it can no longer be used and becomes a legally defined hazardous waste.

When revoking the registration of a pesticide product, EPA often allows time for pesticides in the channels of trade to be used up. This kind of policy was adopted to allow for the depletion of pesticides and to avoid disposal problems. However, when depletion times are not adequate or in the cases of immediate stop sale and use orders, pesticides and their containers are accumulated as waste.

Under the Resource Conservation and Recovery Act (RCRA), the generation, transportation and disposal of hazardous wastes are regulated. Farmers are presently exempt from the generator requirements provided that the containers are triple-rinsed and the pesticide residues are disposed on their own property in a manner consistant with the disposal instructions on the pesticide label. The rinsates created from triple rinsing containers is considered a hazardous waste. However, farmers could apply pesticide rinsate water to their crop or field as long as the residue levels do not exceed those specified by the label directions. In no case are farmers allowed to bury or dump pesticide wastes anywhere on their property.

The Department of Environmental Quality Engineering (DEQE) is the state agency which enforces RCRA. Hazardous wastes are those wastes meeting a specific definition in the DEQE regulations. This definition includes pesticides that have been cancelled by federal or state authorities. Under the DEQE hazardous waste statutes, the farmer is not exempt and must comply with the regulations. The federal government defines a small quantity generator as one which produces less than 1,000 kilogram (2200 lbs) of hazardous waste in a month, while DEQE defines a small generator as one which produces or accumulates 20 kilograms (44 lbs) in a month. Under DEQE requirements, generators of hazardous wastes must notify the EPA, identify the hazardous waste, use a licensed hazardous waste transporter, treatment, storage or disposal facility, use a standardized waste manifest as a shipping document, store the waste by category in a mandated manner and label the waste as a hazardous waste with required information on the label. The farmer, as a small quantity generator, is not required to file an annual report of hazardous waste activity, provide personnel training or develop a contingency plan and emergency procedures.

SURVEY DESIGN

The survey was intended to assess the current stockpile of pesticides that have accumulated as waste on farms, to identify common pesticide disposal practices and to solicit input on viable abatement options. In Massachusetts, there are numerous farms representing a variety of different types of agriculture such as cranberries, corn, apples, potatoes, small vegetables, etc. Approximately, 4000 farmers received the survey which was distributed through the Massachusetts Cooperative Extension Service. Due to the sensitivity of pesticide waste/disposal issues, farmers were instructed to return the survey to the Department anonymously.

The survey was divided into two parts. First, the questionnaire contained eight questions concerning storage and disposal practices. The farmer was instructed to either select an answer or write an appropriate response (Fig. 1). Second, the farmer was to prepare an inventory list of the specific pesticides and quantities currently stored as waste (Fig. 2).

SURVEY ANALYSIS

Of the 4000 surveys mailed, only 7% (272) of the surveys were received by the Department. A number of farmers failed to respond in the correct format or did not answer some questions at all. The percentage of individual questions answered incompletely or incorrectly ranged from 5% to 73%. Individual questions which contained inappropriate or no responses were not evaluated as part of the survey.

Part I: The Questionnaire

Of the 272 responses to the survey, 94 farmers reported only one method of handling pesticide waste. These methods include:

1.	Storing the pesticide	18%;
2.	Discarding pesticides onto the ground	10%;
3.	Burying the pesticides	10%;
4.	Sending pesticides to a landfill	8%;
5.	Hiring a waste hauler	5%;
6.	Discharging into sewer or septic systems	3%.

Fifty-two farmers used a combination of nine disposal methods for their pesticide waste. These methods represented various combinations of the same methods that the farmers using only one method used (Fig. 3).

Responses concerning pesticide containers were very similar to those for pesticide disposal. The major difference is that pesticide containers are most likely to be buried, burned or taken to a landfill rather that other methods listed (Fig. 4). Methods of container disposal include:

1.	Taking pesticide containers to landfills	30%;
2.	Burning the pesticide containers	22%;
3.	Burying the pesticide containers	13%;
4.	Crushing the pesticide containers	10%;
5.	Hiring a waste hauler	10%;
6.	Storing the pesticide containers	5%;
7.	Taking containers to a waste collection center	3%;

The length of time pesticide wastes and containers are stored varied greatly. When asked how long unwanted pesticides and containers have been stored, the majority of farmers either did not respond or reported zero years of storage (Fig. 5). The reported number of years waste has been stored ranged from 3 months to 50 years. Figure 6 represents the middle range of responses excluding the two largest, 0 years and NR (no response).

Farmers who answered the questionnaire were asked: "If it is necessary to pay for a waste hauler, how would you like to see the collection program funded?". From the six choices, (refer to Fig. 1), the number one choice was a container deposit program (28%) (Fig. 7). The state of Maine initiated a similar pesticide container program in 1985. Please refer to Appendix A for a description of the Maine program. The next most popular method was a variable fee at the time of collection (18%), followed by a flat fee at the time of collection (14%) and finally a tax on pesticides (12%).

II. Inventory List

Of the 272 total resposes only 156 completed the pesticide inventory sheet. The majority, 87 respondents, wrote "NONE", indicating that there were not any pesticide waste in storage. Fourteen respondents did not fill out the inventory sheet correctly. These farmers included pesticides that are in storage but are also currently in use.

The fifty-five farmers who responded correctly to the inventory list identified pesticides which are currently in storage and require disposal. Of the pesticides reported, nine accounted for 50% of the pesticide waste farmers wished to dispose. They are as follows:

PESTICIDE	Pounds	% Total	Gallons	% Total
DDT	2345	41%	NA	--
Lead arsenate	698	12%	NA	--
Zinc phosphide	600	10%	NA	--
Chlordane	58	1%	3	>1%
Arsenic	NA	--	55	10%
Oil	NA	--	60	11%
Sevin	28	>1%	NA	--
Temik (aldicarb)	25	>1%	20	4%
Calcium arsenate	7	>1%	NA	--
Others	1983	35%	392	74%
TOTALS	5744	100%	530	100%

CONCLUSIONS

The low response rate to the survey clearly suggests that much of the farming community is reluctant to confide in state agencies about pesticide disposal issues. While there is no way to know for certain why such reluctance exists, it would be fair to assume that farmers are concerned about being held liable for existing pesticide wastes on site.

In any case, the low return rate and quality of information received makes impossible any quantitative analysis of the data alone. However, when viewed in the context of other information available to the Department - such as field data from investigations or disposal incidents - some valid conclusions may be drawn.

One of those conclusions, perhaps not surprisingly, is that current disposal practices are inadequate. To ensure that farmers dispose of pesticide waste legally and safely, we need to thoroughly revamp the existing process and develop a disposal system which truly addresses our environmental and agricultural concerns.

Based on survey results and other indications, it appears that many Massachusetts farmers either are not completely aware of hazardous waste disposal regulations or do not fully comprehend the consequences of their actions. While a growing number of farmers have rejected the out-of-sight/out-of-mind theory and have taken the proper steps to deal with their disposal problems, there may be a number who have not. One of

the reasons for this may be that viable management techniques have not been developed which would enable the farmer to comply with all regulatory standards. Another problem is the inconveniences and costs that compliance mandates for an individual farmer.

For example, farmers deal with pesticides which have a greater level of toxicity and in larger amounts than homeowners. This makes participating in Community Hazardous Waste Collection Programs difficult since under state regulations they are handling defined hazardous wastes. In order to transport the pesticide wastes to the collection site, they must become a licensed hazardous waste hauler and generator.

A farmer who complies with all the regulations and hires a hazardous waste hauler faces other obstacles. First, the cost can be prohibitive. On the average it costs approximately $300 per 30 gallon container to dispose of pesticides. Approximately 100 lbs and 12 gallons fit in a 30 gallon container. In addition to the cost of removing the pesticide, the farmer will also pay for the hauler to complete the required paperwork.

The problem of disposal is compounded by the length of time some pesticides have been held in storage. Farmers have reported storing pesticides up to 50 years. Containers which can include a variety of substances may disintegrate and the labeling may become unreadable. In the absence of labeling, the

only way to identify the material is to have a sample analyzed. Cost of laboratory analysis can increase the cost of disposal considerably.

The estimated cost to properly remove and dispose of pesticide waste can be prohibitive for the farming community. From the limited results of the survey, the waste generated by the 4000 Massachusetts farms theoretically might be as much as 42,000 lbs of solid pesticide waste and 40,000 gallons of liquid pesticide waste. This estimate is extremely tentative and could be half this amount or possibly even more than projected. Based on information provided by one company involved in Community Hazardous Waste Collection Programs, it is estimated that the cost of disposal be as much as $1,260,000 for solid pesticide waste and $1,000,000 for liquid pesticide waste, a total of $2.3 million. Whatever the estimate is, it will cost probably over $1.0 million and under $3.0 million to complete the project.

RECOMMENDATIONS

It is the responsibility of the agricultural and pest control community to become aware of and adhere to existing regulations that govern not only the application of pesticides but the disposal of pesticide waste. However, federal and state authorities must recognize the need to create an atmosphere which facilitates compliance. Simple adherence to existing statutes has and will not solve the problems of pesticide disposal. Actually, these same statutes have resulted in or facilitated many of the pesticide disposal problems facing the Commonwealth today because they discourage adoption of practical disposal measures and new technology. The farming community and associations, local and regional planning organizations and state and local authorities must work together in a two step approach to eliminate the current stockpile and future accumulation of pesticide waste.

First, the existing stockpile of pesticide waste must be removed and disposed of in a legal and safe manner. Given the complexities of identifying, transporting and disposing of existing wastes, the Commonwealth should establish a dedicated fund for a program which would subsidize the costs associated with the transportation and disposal of pesticide waste from agricultural use. This program would contract a licensed hazardous waste hauler to identify and eliminate the existing stocks.

The program would work entirely through the licensed hazardous waste hauler which will decrease apprehension on the part of the farming community and increase involvement in the program. The hauler would initiate the program by contacting the farmer in writing. Once told of the opportunity to participate in the program, the farmer would return information to the hauler (specific pesticides, amounts, condition of containers). Upon receiving this information, the hauler could prepare a pesticide pick up schedule. The farmer would be required to assume fifty percent (50%) of the total cost of disposal on a cost share basis with the Commonwealth providing the remaining cost.

The funding for this program is possible from two sources. First, the Department of Environmental Management receives funds from the legislature each year to operate local hazardous waste collection days. This program subsidizes the costs associated with disposal of hazardous wastes generated by residents. DEM grant funds may be a readily available source of pilot funding. However, it is not anticipated that the funds in the DEM program could provide all the resources necessary to eliminate agricultural hazardous waste. The limitations on the legislative appropriation may also make it difficult to utilize these funds for purposes other than community hazardous waste collection. Secondly and more appropriately, the funds for the program can be secured by raising the pesticide product registration fee. Currently, the Commonwealth requires a $10

registration fee for each pesticide product registered in Massachusetts. The level of this registration fee is greatly lower than other state pesticide product registration fees and other fees imposed by the Commonwealth. Each $10 increase in the registration fee will raise approximately $80,000. A modest increase in the registration fee to $50 would provide adequate funding for the program. In order for these funds to become available, the legislature would have to amend the Massachusetts Pesticide Control Act to allow the Department of Food and Agriculture to raise this fee as well as retain the funds for the program.

The second step involves a program which would eliminate future accumulation of pesticide waste. This should not be a seperate step from the removal of existing waste but rather an on going program which should and can begin immediately. There are a number of approaches that can be taken to minimize a reoccurrence of this problem.

The farming community, through the Cooperative Extension Service, should train farmers in proper methods of handling pesticides in order to minimize waste. Much work has been done in the area of Integrated Pest Management to minimize the need for pesticides which in turn results in a decrease in the generation of waste. Additionally, practices such as triple rinsing containers and using the rinsate as diluent in the spray tank will result in containers that pose no risk and are not considered a hazardous waste as well as effectively removing the need to dispose of the rinsates.

The EPA and the Pesticide Board Subcommittee should carefully consider measures to minimize the accumulation of pesticide waste when action is taken against the registration of pesticides. As previously noted, the EPA routinely allows for certain pesticides to be used through the channels of trade after an action is taken. The Massachusetts Subcommittee has on occasion taken similar measures to minimize the accumulation of hazardous waste through registration decisions. However, this sort of policy is not always been followed especially when the concern involves an imminent hazard to humans or the environment.

Much larger and more complex problems must also be considered. Development and implementation of on site treatment technologies, such as evaporation systems and biological degradation should be pursued along with any changes in existing laws that may be necessary to utilize these technologies. Newer technologies such as ozonation and bacterial degradation may not be immediately available, but high temperature burning facilities are efficient, safe and available. The location and establishment of an in-state facility to handle and inactivate pesticide and other hazardous waste would assist in the elimination of hazardous wastes generated in the Commonwealth.

Finally, the Department should carefully consider promulgation of regulations that may be needed to assure proper and environmentally sound handling of pesticide waste, rinsate and containers. The standards of proper pesticide storage for

agriculture and commercial operations may be established in regulation. Issues such as mandating reuse of rinsates and tracking restricted use pesticide containers may need to be address. These standards would ensure that pesticides are stored in a manner that would minimize the potential of risk to humans and the environment.

APPENDIX A:

The State of Maine Returnable Pesticide Container Regulations

In 1983, the Maine legislature passed a law requiring proper handling of restricted and limited use pesticide containers. On November 19, 1984 the Maine Board of Pesticide Control adopted regulations to implement the law. The regulations became effective on April 1, 1985 and applies to all restricted and limited use pesticides sold in glass, metal and plastic containers. The regulations do not apply to general use pesticides and those restricted use pesticides packaged in paper, cardboard or fiberboard. These containers must be disposed in a manner described on the label. The regulations are divided into three sections as follows:

IN-STATE PURCHASES

Deposits are charged by dealers on each container covered by the regulations at the following rates:

less than 30 gallons	$5.00
30 gallons or more	$10.00
Refillable containers	may be higher than above

Deposits for each container are collected by the dealer at the time of sale or delivery. Persons obtaining their pesticides on a charge account may also have the deposits charged to their account.

Stickers are attached to all restricted and limited use pesticide containers. These stickers are alpha-numeric to allow identification of both the dealer and the purchaser. The dealers affix a sticker to each container prior to or at the time of sale. Unopened cases may have the correct number of stickers attached to the case. It is then the responsibility of the purchaser to attach the stickers to the containers. The stickers must be affixed to the containers and in no case interfer with the label or trademark. It is illegal to remove, deface or otherwise render the stickers illegible.

An affidavit is required to be filled out by the purchaser at the time of delivery. Dealers provide affidavit forms to their customers. Affidavits must contain the following information:

a. the dealer's name, purchaser's name, number of containers, deposit paid, name of the pesticide, sticker numbers and the location where the containers can be returned for a refund;

b. the signature of the purchaser or their agent, certifying that the containers have been triple rinsed;

c. the signature of the operator of the recycling, collection or disposal facility certifying that the containers were returned.

The purchaser would then take the affidavit to the dealer the pesticide was purchased from in order to be refunded.

Farmers are required to triple rinse their containers at the time of emptying. Maine conducted a limited research project to determine the range of residues left in containers after triple rinsing.

OUT-OF-STATE PURCHASES

Persons buying restricted and limited use pesticides in glass, metal or plastic containers must handle them in a manner similar to that for in-state purchases with the following exceptions:

a. deposits must be paid in cash to the Board of Pesticide Control for each pesticide container purchased out-of-state;

b. stickers will be furnished by the Board to the purchaser for a minimal fee to cover the costs of printing and shipping the stickers. The purchaser will be responsible for affixing the stickers to the containers;

c. an affidavit will be supplied by the Board to the purchaser who must sign it once the containers have been triple rinsed;

d. the purchaser will have to deliver the triple rinsed containers and affidavit to an approved collection, recycling or disposal site. After the facility operator signs the affidavit, the purchaser must send the affidavit to the Board's office. Upon receipt of the completed affidavit, the Board will refund the entire deposit to the purchaser.

HELD-OVER CONTAINERS

Persons holding restricted or limited use pesticides in glass, metal or plastic containers from previous years must have requested special stickers from the Board prior to April 1, 1985. Stickers were provided free of charge by the Board and it was the responsibility of the person holding the pesticides to insure that the stickers were affixed in the proper manner so as not to interfer with the label or trademark. Affidavits were not required but these containers were to be triple rinsed and disposed of at an approved site.

FIGURE 1

County:________________

SURVEY

In order to pursue the possiblity of state cost-sharing for a collection day, it will be helpful to know what current disposal practices are. Your responses will be completely anonymous.

NOTE: Pesticides include insecticides, herbicides, miticides, fungicides etc.

1. How have you disposed of waste pesticides and pesticide containers in the past? (Check all that apply).

Containers

☐ buried
☐ burned
☐ landfill
☐ crushed
☐ waste collection center
☐ waste hauler
☐ stored
☐ other (explain)

Pesticides

☐ buried
☐ dispose on ground
☐ landfill
☐ drain or sink
  ☐ town sewer
  ☐ septic tank
☐ waste hauler
☐ stored
☐ other (explain)

2. If you currently have any unwanted pesticides or containers in storage, how long have you been saving these?

3. What is your estimate of the amount of waste pesticides you generate in a year?

4. Approximately how many empty pesticide containers do you accumulate in a year?

5. What is the maximum distance you would travel (roundtrip) to a collection site?

☐ 5 miles ☐ 10 miles ☐ 50 miles ☐ 100 miles __________miles

6. If it is necessary to pay for a waste hauler, how would you like to see a collection program funded?

a. ☐ tax on pesticides
b. ☐ container deposit (as in bottle bill) $________per/container
c. ☐ purchase fee
d. ☐ variable fee at time of collection $ ________per gallon liquid
$ ________per lb. dry material
$ ________per farm/person
e. ☐ flat fee at time of collection
f. ☐ other ____________________________

7. If funding is all or part by D or E what is the maximum total you are willing to pay?

8. Do you have insurance that covers the use of pesticides or pesticide-related activities?

☐ yes ☐ no

FIGURE 2

Directions for Completing Table

It is necessary to have accurate estimates of quantity of specific materials in order to schedule collection days and prepare cost estimates.

Please include all information, if available.

1. Please indicate County where your pesticides are being stored.
2. List the brand name or registered name of the pesticide as it appears on the label.
3. List the EPA Registration No. (usually found near the active ingredient statement) or the USDA No.
4. List the primary Active Ingredient. This will be the first ingredient listed under the Active Ingredient Statement.
5. Indicate the total amount of the pesticide in the appropriate units - gallons, pints, pounds, ounces etc.
6. Please indicate by check mark whether the pesticide is a liquid or solid (powder, granule, dust etc.).
7. If any of the pesticides you wish to dispose of are in 55 gallon drums, list them only in the special section so labeled, indicating the number of drums to be disposed of.
8. If any of the labels are destroyed or unreadable, please provide as much information as you can on each of the pesticides.

PLEASE DO NOT COMPLETE THIS SURVEY MORE THAN ONCE

Use back of sheet if necessary.

① County:____________________

② Brand Name or Registered Name	③ EPA or USDA No.	④ Primary Active Ingredient	⑤ Total Amount (lbs,gallons etc.)	⑥ Liquid	Solid
⑦ (55 gallon drums)			(Number of containers)		
⑧ Labels destroyed or unreadable or damaged containers					

FIGURE 3

PESTICIDE WASTE DISPOSAL PRACTICE

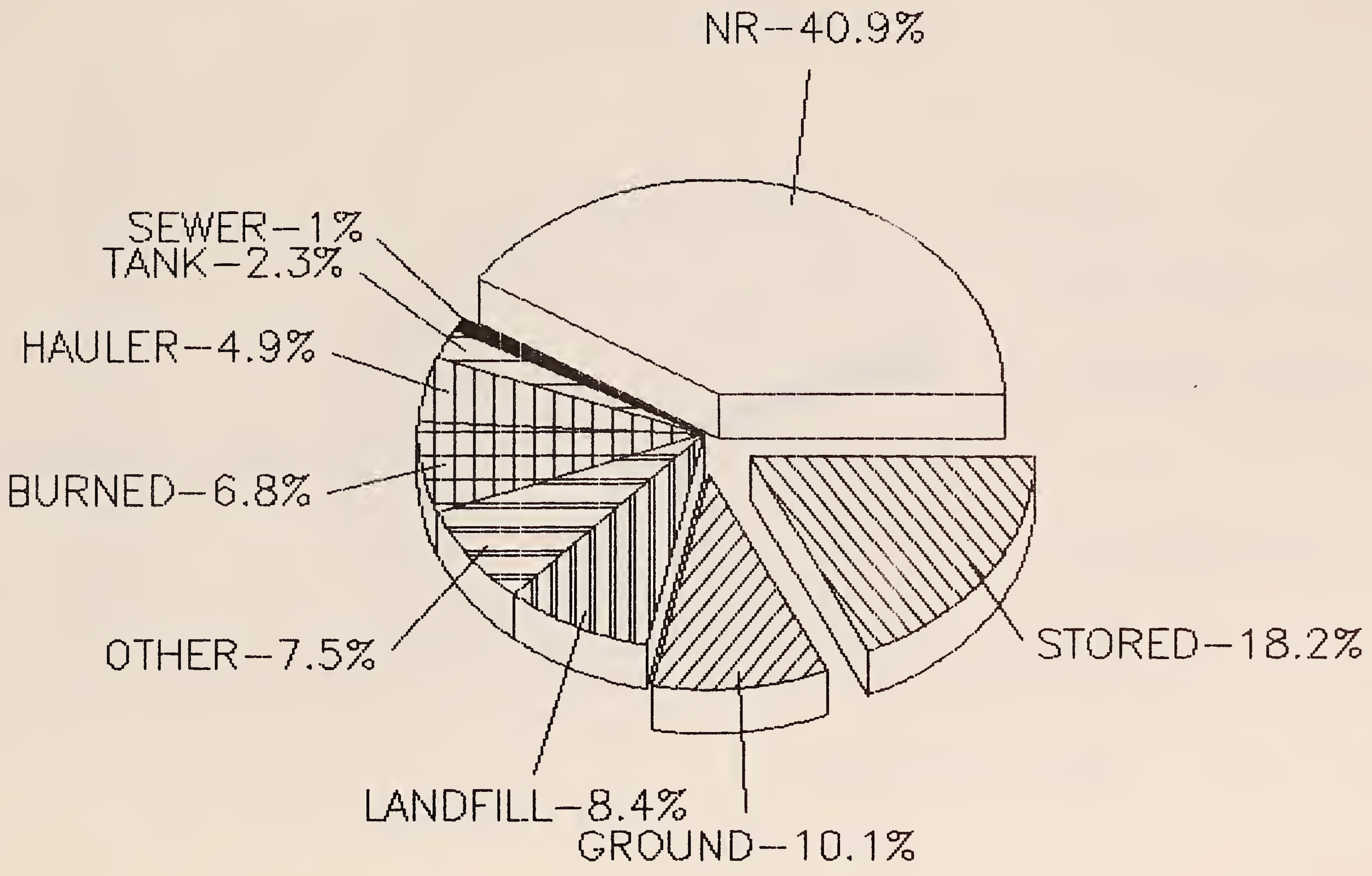

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FIGURE 4

CONTAINER DISPOSAL PRACTICES

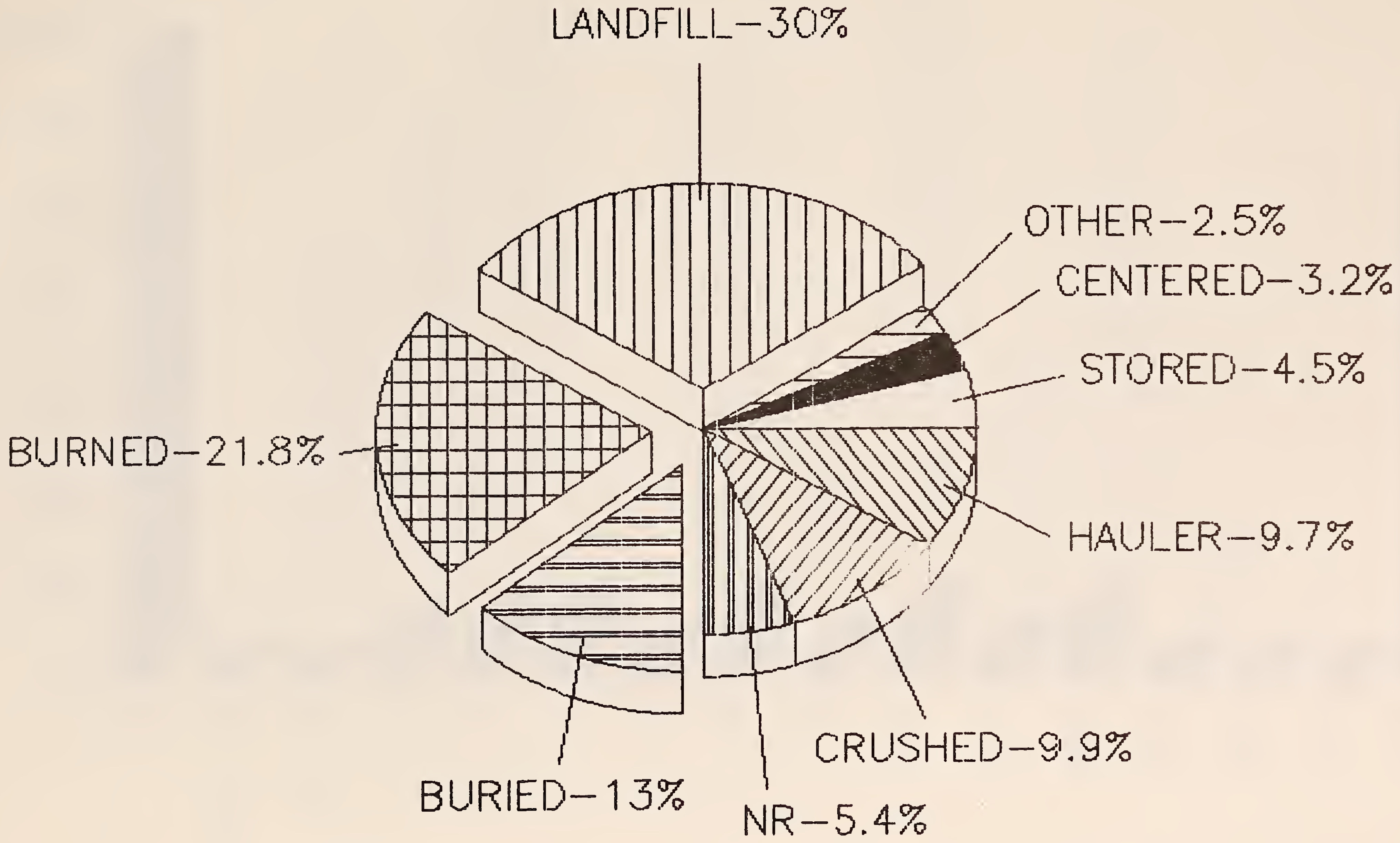

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FIGURE 5

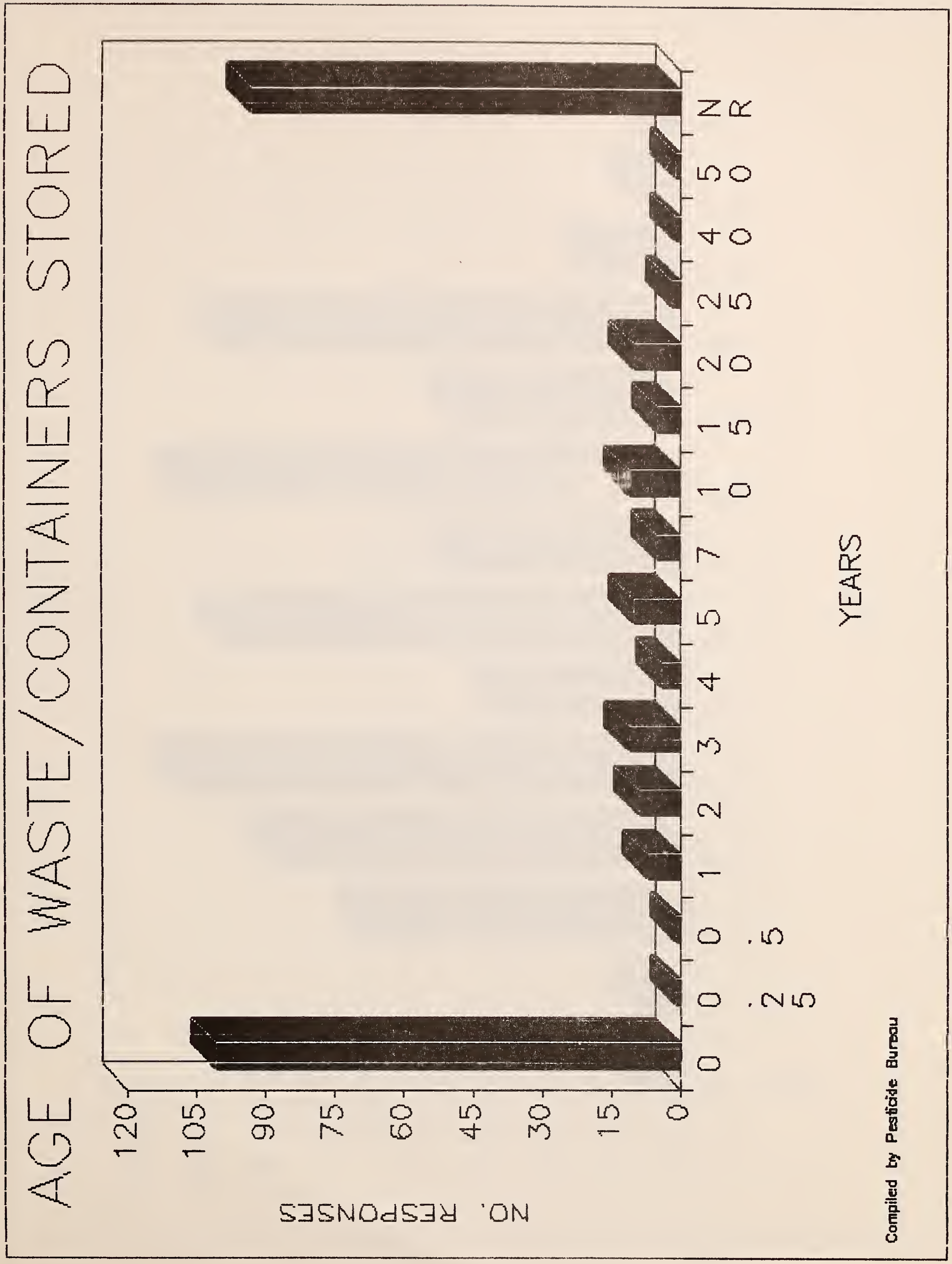

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FIGURE 6

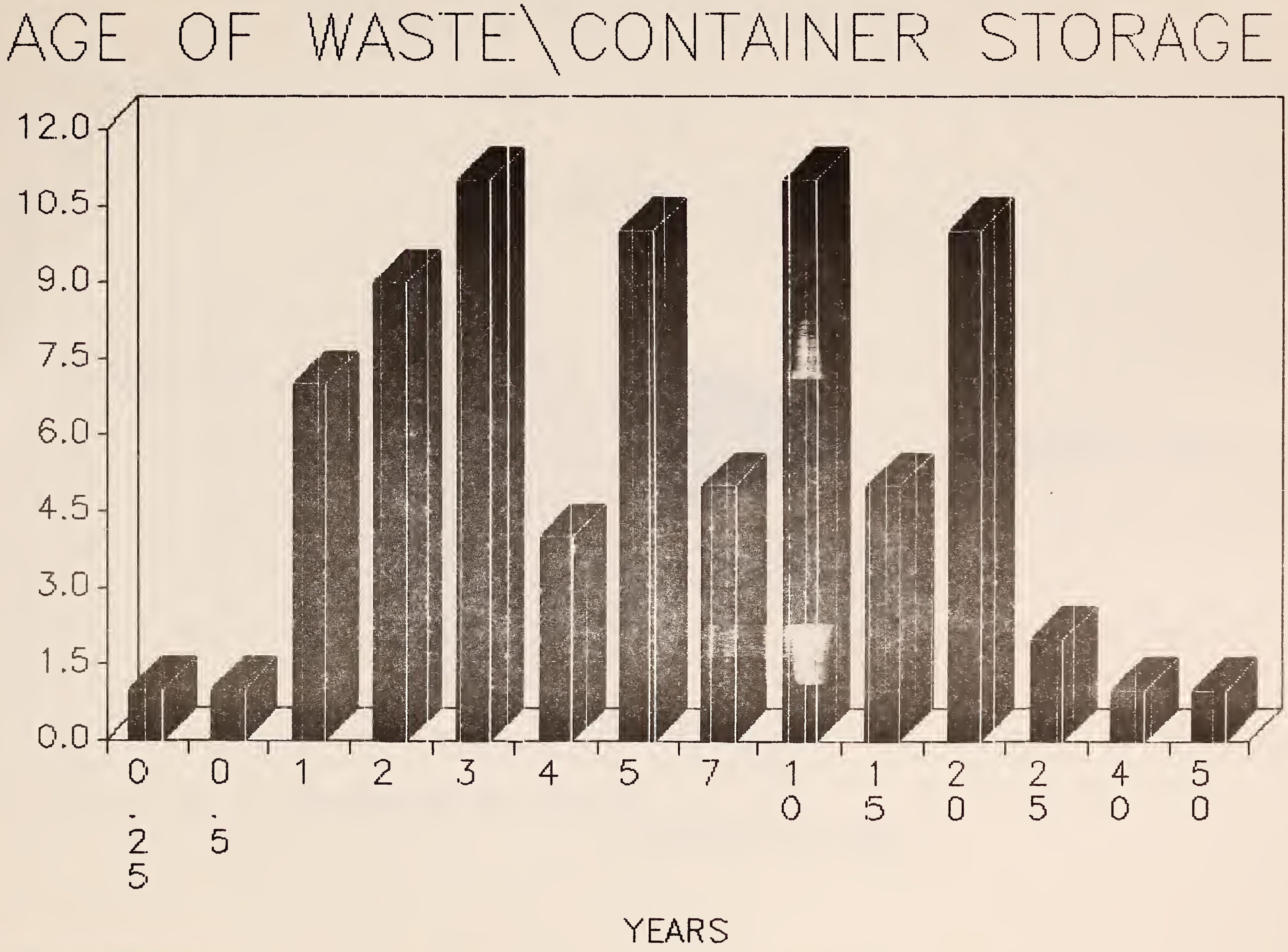

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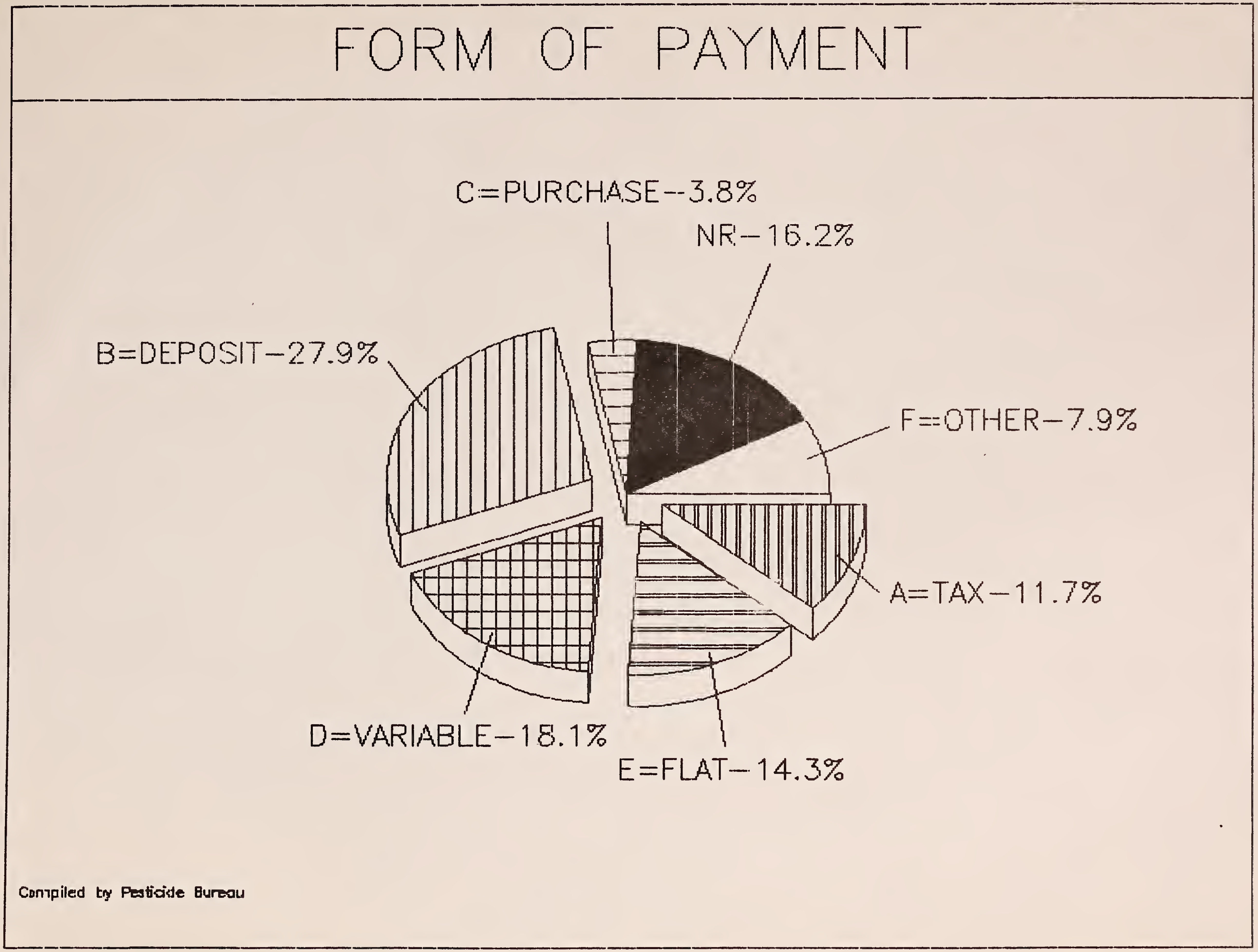
FIGURE 7



FORM OF PAYMENT

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